From: Schulz, Natalie
To: W Michael Oberfield
Cc: Kuss, Hala; Demma, Carlo; Russell, Tess; Reed W. Sirak
Subject: US EPA - Renergy 1/13 Meeting Follow-up
Date: Friday, January 14, 2022 9:03:00 AM

Hello Mike,

Exemption 7(a) [redacted]

Please answer the following questions, as discussed in the meeting today:

1. Describe the engine rebuild project at Emerald. What were the approximate start and end dates of the project?
2. Describe any projects or cleanouts of the anaerobic digester or engine at Dovetail. Why is there no data reported for Dovetail in the Heat Content and Energy Generation spreadsheet for July 2020 through September 2021? If cleanouts or other projects caused an interruption to operations, please provide the duration.
3. There are numerous days in which the difference between two consecutive days' engine Run Hours is above 24 hours. For example, see Response #4, Emerald: the difference between "Run Hours" for August 7, 2018 and August 6, 2018 is 34 hours. Please explain how the engine's Run Hours can exceed the number of hours in one day. If necessary, provide updated spreadsheets for both facilities with correct engine Run Hours.
4. In the spreadsheet titled "13 Heat Content", please advise as to whether the value for March 2020 for Dovetail is a typo. We believe the value for Flare Hours was provided instead of the Minimum Heat Content value.
5. Please send EPA the operating manual for the Sewerin Multitec 545 monitor and provide EPA documentation required by the permit that this continuous monitoring device meets or exceeds the requirements of performance specification 5 at 40 CFR Part 60, Appendix B, to ensure conformance of the CEMS to the specification. Please also supply the calibration Drift (CD) and Relative accuracy (RA) tests required in section 13 of performance specification 5 to

EPA, along with the supporting documentation. Please let EPA know if Renergy plans to continue using the gas monitoring device at the Emerald facility into the future after the aforementioned engine rebuild is complete. Confirm which monitor Emerald is currently using to measure H2S levels. If not using the Sewerin monitor, please provide the manual for the monitor being used.

6. According to the permit in section A.3, Renergy is required to retain all records required by the permit for five years from the date the record was created. Please provide to EPA the weekly data for the Dovetail Facility that was gathered with the Landtec Biogas 5000, for hydrogen sulfide concentrations at the flare.
7. According to the permit in section A.3, Renergy is required to retain all records required by the permit for five years from the date the record was created. Please provide to EPA the continuous data for the Emerald Facility that was gathered with the Sewerin Multitec 545, for hydrogen sulfide concentrations at the flare.
8. Provide any documentation Renergy has kept regarding the de minimis status of the sludge lagoons at both Emerald and Dovetail.
9. Provide the Annual Permit Evaluation Reports for both Emerald and Dovetail for the last five years, as requested in the original information request. The current submission for Emerald has the same document for 2020 and 2021 and does not have the complete past five years for either Emerald or Dovetail.
10. Regarding the response to Information Request #18, Renergy is required by 40 CFR Part 63, Subpart ZZZZ, to keep records of how the company maintains and operates the engines. Please submit the Operation and Maintenance Plan or similar document to EPA, along with the initial notification of engine rebuild at the Emerald facility.
11. Are there scheduled stack tests for the engines at Emerald and Dovetail? If yes, when?
12. Please provide a response to Information Request #21, as initially required by the information request letter.
    a. What's the capacity of each flare at Dovetail and Emerald?
    b. If Renergy does not regularly monitor the average mass flow rate of the Vent Gas to the flare, how does each facility ensure each flare's capacity is not being breached?
    c. Provide the calculation of each flare's exit velocity. Provide the calculation of each flare's Vmax (maximum velocity).
    d. Provide the corresponding calculations of the monthly Methane % (used in the calculation for net heating value, Response #22) for each month in 2020.
    e. Provide a narrative explaining how Dovetail and Emerald calculate Net Heating Value in accordance with 40 CFR Part 60.18, as required by each facility's permit, as shown in the calculation of net heating value provided in Response #22.
        i. Provide documentation or evidence of Renergy's determination that the net heating value of methane (BTU/scf) is 1011 BTU/scf.

Please provide us this information by Friday, January 28, 2022. I will be reopening your access to the OneDrive folder to submit the response, same as the submittal for the original Information Request. If you encounter difficulties in gathering this information by the deadline, please contact me or Hala Kuss at kuss.hala@epa.gov .

Thank you,

Natalie Schulz

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